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April 24, 2006

Mr. James Ricks, SFD-8-1
EPA Work Assignment Manager
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

**Subject: Contract No. 68-W-02-052 / WA No. 052-19-09P3
Hunters Point Shipyard Work Assignment, Review of the Three Sets of
Responses to Comments on the Storm Drain/Sanitary Sewer Radiological
Removal Action, Hunters Point Shipyard, San Francisco, California, April
2006**

Dear Mr. Ricks:

Enclosed please find TechLaw's Three Sets of Responses to Comments on the Storm Drain/Sanitary Sewer Radiological Removal Action, Hunters Point Shipyard, San Francisco, California, submitted by email on April 18, 2006. These packages include responses to EPA comments on the Revised Final Basewide Radiological Removal Action Memorandum; The Draft Final Project Work Plan, Basewide Storm Drain and Sanitary Sewer Removal; and the Draft Final Parcel B Design Plan, Storm Drain and Sanitary Sewer Removal, Parcel B.

We do not have any further comments on the Final Basewide Radiological Removal Action Memorandum, dated April 21, 2006. We were able to download the revised document from Tetrattech's FTP site. It appears that EPA's comments were addressed and that the responses were incorporated into the document.

We have some comments on the Draft Final Project Work Plan, Basewide Storm Drain and Sanitary Sewer Removal because the responses do not address EPA's concerns about the extent of contamination indicated by the confirmation sampling results for the excavations reported in the *Parcel B Construction Summary Report* and the *Parcel B Construction Summary Report Addendum*. These comments are attached.

We were not able to evaluate whether most of the responses to EPA comments on the Draft Final Parcel B Design Plan, Storm Drain and Sanitary Sewer Removal, Parcel B were incorporated into the document because we need hard copy of the drawings. The drawings are too large and have too much to effectively review on a monitor. Since the hard copy of this document arrived today and additional time will be required to review the drawings, since fairly extensive changes to the drawings were requested, as discussed with today Michael Work, comments are not being submitted on this document at this time.



These comments are being forwarded to you through electronic mail (via Internet) in WordPerfect® Version 11 format. A hard copy of these comments will also be submitted with this cover letter. TechLaw understands you will review and augment the comments at your discretion.

Thank you for the opportunity to provide the U.S. EPA with technical oversight services for Hunters Point Shipyard. Should you have any questions or comments, please contact the TechLaw Site Manager, Karla Brasaemle, at (415) 281-8730, extension 12.

Sincerely,



Indira G. Balkissoon
Regional Manager

KB:IB:IB:cl

cc: Patricia Brown-Derocher/Central Files, TechLaw, Inc.
Mr. Michael Work, USEPA

Review of the Draft Final Project Work Plan, Basewide Storm Drain and Sanitary Sewer Removal, Hunters Point Shipyard, April 2006

Response 6: This response states that the Parcel B Technical Memorandum in Support of a Record of Decision (ROD) Amendment (TMSRA) and the historic boundaries of groundwater plumes will be reviewed to determine when field segregation of soil is necessary, but EPA identified many areas where it appears that the extent of excavation in Parcel B was insufficient based on our review of the Parcel B Construction Summary Report (CSR) and Construction Summary Report Addendum (CSRA), which are not reflected in the TMSRA or by the boundaries of historic groundwater plumes. Further, some excavations were not opened in IR-10 because the surface could not be breeched during soil vapor extraction. Since Parcel B was filled in layers, it is likely that contamination extends beyond the former excavation boundaries, particularly when confirmation samples were not collected from the contaminated layers. For example, in the vicinity of former Fuel Line F, which is in the vicinity of the storm drain lines that lead to Outfall 1, it appears that there is a layer of soil that has high levels of copper, zinc, and polyaromatic hydrocarbons (PAHs) at the 2 to 3 foot depth below the ground surface (ft bgs). Confirmation samples were not collected from the sidewalls at the 2 to 3 ft depth when the depth of the excavation was extended to 5 or 6 ft bgs. Therefore, it is insufficient to rely on the TMSRA or historic groundwater plume boundaries to evaluate whether soil should be segregated. EPA provided the Navy with two tables summarizing our issues and concerns about the extent of contamination remaining in place after the completion with the excavations. Please review the CSR and CSRA issue summary tables submitted by EPA in addition to the boundaries of historic groundwater plumes. It may be necessary to overlay the CSR and CSRA excavations over the storm drain and sanitary sewer lines in order to carry out this evaluation.

Response 8: In general, we agree with the proposed approach, however, it is unclear how it will be determined if site conditions warrant segregation of materials from areas of non-IR sites that are adjacent to an IR site. Since the first sentence states this will be done, "when warranted based on site conditions," these conditions should be specified. EPA's tables summarizing issues and concerns related to the excavations reported in the CSR and CSRA should be part of this determination. Please provide decision rules or a more detailed description to define when site conditions will require segregation of soil from non-IR site areas that are adjacent to IR sites.